

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROBERT SHEAFFER,)	
)	
Plaintiff,)	
)	
v.)	Case No. 19-cv-03899
)	
GLENDALE NISSAN, INC.)	Honorable Sara L. Ellis
)	
Defendant.)	

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION
OF TIME TO ANSWER OR OTHERWISE PLEAD**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant, Glendale Nissan, Inc. (“Glendale Nissan”), by and through its undersigned counsel, hereby moves for an extension of time to answer or otherwise plead in response to Plaintiff’s Complaint (the “Complaint”). In support of its motion, Glendale Nissan states as follows:

1. Plaintiff filed a Complaint against Glendale Nissan alleging seven causes of action: (1) violation of the Illinois Whistleblower Act; (2) common law retaliatory discharge; (3) hostile work environment in violation of Title VII; (4) retaliation in violation of Title VII; (5) violation of the Illinois Gender Violence Act; (6) violation of the Age Discrimination in Employment Act; and (7) violation of the Illinois Wage Payment and Collection Act.

2. Glendale Nissan was served with the summons and Complaint on June 13, 2019. Glendale Nissan is required to answer or otherwise plead on or before July 5, 2019.

3. Glendale Nissan is still investigating the allegations set forth in the Complaint. Additionally, counsel for Glendale Nissan is currently preparing for trial in another matter scheduled to commence in July, *Schweihs v. Chase Home Finance, et al.*, Circuit Court of Cook

County Case No. 2017 L 6030. Therefore, Glendale Nissan requests an extension of 28 days, to and including August 2, 2019 to answer or otherwise plead in response to Plaintiff's Complaint.

4. Plaintiff has no objection to the request for an extension.
5. This is Defendant's first request for an extension. The request is not meant for the purpose of undue delay and no party will be prejudiced by this extension.

WHEREFORE, Defendant, Glendale Nissan, Inc. requests that this Court grant it an extension of 28 days, to and including August 2, 2019, to respond to Plaintiff's Complaint, and to grant such further and additional relief as this Court deems just and appropriate.

Dated: June 24, 2019

GLENDALE NISSAN, INC.

By: /s/ Elizabeth M. Pall
One of Its Attorneys

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